

Sean Larson, Wyo. Bar #7-5112
 Kari Hartman, Wyo. Bar # 8-6507
 HATHAWAY & KUNZ, LLP
 P. O. Box 1208
 Cheyenne, WY 82003-1208
 307-634-7723
 307-634-0985 (Fax)
slarson@hkwyolaw.com
khartman@hkwyolaw.com

Paula K. Colbath, Esq. (Admitted *Pro Hac Vice*)
 Alex Inman, Esq. (Admitted *Pro Hac Vice*)
 LOEB & LOEB LLP
 345 Park Avenue
 New York, NY 10154
 212-407-4905
 212-407-4990 (Fax)
 ATTORNEYS FOR DEFENDANTS MINEONE
 WYOMING DATA CENTER, LLC

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

BCB CHEYENNE LLC d/b/a BISON)
 BLOCKCHAIN, a Wyoming limited liability)
 company,)
)
 Plaintiff,)

Civil Action No. 23CV-79-ABJ

v.)
)
 MINEONE WYOMING DATA CENTER)
 LLC, a Delaware limited liability company;)
 MINEONE PARTNERS LLC, a Delaware)
 limited liability company; TERRA CRYPTO)
 INC., a Delaware corporation; BIT ORIGIN,)
 LTD, a Cayman Island Company;)
 SONICHASH LLC, a Delaware limited)
 liability company; BITMAIN)
 TECHNOLOGIES HOLDING COMPANY, a)
 Cayman Island Company; BITMAIN)
 TECHNOLOGIES GEORGIA LIMITED, a)
 Georgia corporation; and JOHN DOES 1-20,)
 related persons and companies who control or)
 direct some or all of the named Defendants.)

Defendants.)

**DEFENDANT MINEONE WYOMING DATA CENTER, LLC’S MOTION
FOR PERMISSION TO FILE RESPONSE BRIEF IN EXCESS OF PAGE
LIMIT**

COMES NOW Defendant MineOne Wyoming Data Center LLC (“MineOne Data”), by and through counsel, HATHAWAY & KUNZ, LLP, and LOEB & LOEB LLC, and hereby files this motion seeking the Court’s permission to file a twenty-page response brief to *Plaintiff BCB’s Emergency Motion for Protective Order* (ECF No. 317) and *Supplemental Briefing and Motion for Protective Order on MineOne’s August Subpoenas to BCB’s Passive Investors, MineOne’s Request for BCB’s Capitalization and Funding, and For Production of BCB’s Request for Proposal to BHE* (ECF No. 325).

Local Rule 7.1(b)(1)(C) provides that briefs in opposition to non-dispositive motions can only contain ten pages unless there are complex or numerous legal issues justifying an extension. Here, MineOne Data needs ten additional pages to respond to BCB’s *Motion for Protective Order* given that there are seven subpoenas at issue in the Motion and Plaintiff has already submitted approximately 28 pages for briefing related to the Motion.

Plaintiff’s opening brief is 18 pages, and as Judge Johnson observed in the Court’s Notice of Procedural Disposition Regarding Plaintiff’s Emergency Motion (ECF No. 317), BCB filed its overlength brief ***without*** “request[ing] permission to file a brief in excess of ten pages.” ECF No. 320 at n.1. BCB then filed an additional ten page supplemental brief (ECF No. 325), with numerous footnotes with excessively small font. MineOne Data seeks an additional ten pages to respond to BCB’s opening brief and supplemental brief.

Counsel for MineOne Data conferred with counsel for Plaintiff. Counsel for Plaintiff objects to this motion.

MineOne Data respectfully requests this Court's order allowing it to file a response brief to BCB's *Motion for Protective Order* of twenty pages in length.

DATED this 3rd day of September, 2024.

DEFENDANT MINEONE WYOMING DATA
CENTER, LLC

By: /s/ Sean Larson

Sean Larson Wyo. Bar #7-5112
Kari Hartman, Wyo. Bar #8-6507
HATHAWAY & KUNZ, LLP
P. O. Box 1208
Cheyenne, WY 82003
Phone: (307) 634-7723
Fax: (307) 634-0985

Paula K. Colbath, Esq. (Admitted *Pro Hac Vice*)
Alex Inman, Esq. (Admitted *Pro Hac Vice*)
345 Park Avenue
New York, NY 10154
Telephone: 212-407-4905
Fax: 212-407-4990

ATTORNEYS FOR DEFENDANT MINEONE
WYOMING DATA CENTER, LLC

CERTIFICATE OF SERVICE

This is to certify that on the 3rd day of September, 2024, a true and correct copy of the foregoing was served upon counsel as follows:

Patrick J. Murphy	<input checked="" type="checkbox"/> CM/ECF
Scott C. Murray	<input type="checkbox"/> Fax:
Williams, Porter, Day & Neville, P.C.	<input type="checkbox"/> E-mail:
159 N. Wolcott., Suite 400	pmurphy@wpdn.net
P.O. Box 10700 (82602)	smurray@wpdn.net
Casper, WY 82601	
<i>Attorneys for Plaintiff</i>	
Khale J. Lenhart	<input checked="" type="checkbox"/> CM/ECF
Tyson R. Woodford	<input type="checkbox"/> Fax:
Hirst Applegate, LLP	<input type="checkbox"/> E-mail:
P. O. Box 1083	klenhart@hirstapplegate.com
Cheyenne, WY 82003-1083	twoodford@hirstapplegate.com
William K. Pao, <i>pro hac vice</i>	<input checked="" type="checkbox"/> CM/ECF
Cooley LLP	<input type="checkbox"/> Fax:
Wells Fargo Center, South Tower	<input type="checkbox"/> E-mail:
365 South Grand Avenue, Suite 900	wpao@cooley.com
Los Angeles, CA 90071-1560	
Marc Feinstein, <i>pro hac vice</i>	<input checked="" type="checkbox"/> CM/ECF
David Iden, <i>pro hac vice</i>	<input type="checkbox"/> Fax:
Kate Stutz, <i>pro hac vice</i>	<input type="checkbox"/> E-mail:
Daniel Hirsch, <i>pro hac vice</i>	mfeinstein@omm.com
Sherin Parikh, <i>pro hac vice</i>	dhirsch@omm.com
O'Melveny & Myers, LLP	diden@omm.com
400 South Hope Street, 18 th Floor	kstutz@omm.com
Los Angeles, CA 90071	sparikh@omm.com
<i>Attorneys for Bitmain Technologies Georgia Limited</i>	
Meggan J. Hathaway	<input checked="" type="checkbox"/> CM/ECF
Jane M. France	<input type="checkbox"/> Fax:
Sundahl, Powers, Kapp & Martin, L.L.C.	<input type="checkbox"/> E-mail:
500 W. 18 th Street, Suite 200	mhathaway@spkm.org
Cheyenne, WY 82003-0328	jfrance@spkm.org

Marc S. Gottlieb
Ortoli Rosenstadt, LLP
366 Madison Avenue, 3rd Floor
New York, NY 10017
Attorneys for Bit Origin and SonicHash

☒ CM/ECF
☐ Fax:
☐ E-mail:
msg@orllp.legal

/s/ Candice Hough
Hathaway & Kunz, LLP